

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

MARIA MOE,

Plaintiff,

v.

DONALD TRUMP, in his official capacity as
President of the United States; JAMES R.
MCHENRY III, in his official capacity as Acting
Attorney General of the United States; WILLIAM
LOTHROP, in his official capacity as Acting
Director of the Federal Bureau of Prisons;

Defendants.

Civil Action No. 1:25-cv-10195

**PROPOSED ORDER GRANTING
PLAINTIFF’S MOTION TO
PROCEED UNDER PSEUDONYM,
TO FILE UNDER SEAL, AND FOR
PROTECTIVE ORDER**

THIS MATTER having been opened to the Court by GLBTQ Legal Advocates & Defenders, National Center for Lesbian Rights, and Lowenstein Sandler LLP, counsel for Plaintiff MARIA MOE (“Plaintiff”), by way of motion for an order granting authorization to proceed under a pseudonym in the above-captioned matter, to partially seal the Complaint and emergency motion for a TRO and preliminary injunction, as well as the supporting declarations and memorandum of law filed with that motion, to seal the declaration of Plaintiff’s criminal defense lawyer, and for a protective order (“Plaintiff’s Motion”), and the Court, having reviewed the submissions of the parties in support thereof and in opposition thereto, and having considered the arguments of counsel, if any, in connection with this Motion; and for good cause shown:

IT IS on this ____ day of _____, 2025, ORDERED that:

1. Plaintiff’s Motion is, **GRANTED**;
2. Plaintiff is permitted to proceed under a pseudonym during the duration of the case;

3. Plaintiff may partially seal the Complaint and emergency motion for a TRO and preliminary injunction, as well as the supporting declarations and memorandum of law filed with that motion, as effected in the proposed redacted forms submitted by Plaintiff;

4. Plaintiff may file the declaration of her criminal defense lawyer under seal;

5. Defendants may not disclose Plaintiff's identity to any third party unless such disclosure is necessary to defend against this action; and

6. Any party, including any third parties, that files a document identifying Plaintiff must redact all personal identifiers in accordance with Federal Rule of Civil Procedure 5.2 and must also redact:

- a. Plaintiff's biographical details, including but not limited to her age, place of residence, current and former names, date of birth, school experience, the identity of her mother and criminal defense attorney;
- b. Plaintiff's criminal history, including the crimes she was convicted of, quotes from the sentencing judge, the period of her incarceration, her disciplinary record, her rehabilitation activities, and her relationship and communications with her lawyer;
- c. All details of Plaintiff's medical history, records, treatments, and specific physical and mental health diagnoses, including those outside of her gender dysphoria; and
- d. Any other information that could identify Plaintiff to the public.

United States District Judge